

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

IN RE:

Timothy Drue Thieme
DEBTOR(S)

CASE NO. 16-31979
CHAPTER 13

RESPONSE TO TRUSTEE'S MOTION TO DEEM MORTGAGE CURRENT

NOW COMES, U.S. Bank Trust National Association, as Trustee of the LB - Igloo Series IV Trust (hereinafter referred to as Creditor), by and through its attorneys, McMichael Taylor Gray, LLC and files this Response to Trustee's Motion to Deem Mortgage Current filed on October 13, 2021, docket number 55.

1. Creditor disagrees that the amount required to cure the pre-petition delinquency as set forth in Creditor's claim has been paid in full.
2. Creditor disagrees that the account is current. The Debtor is pre-petition due for the August 1, 2021 payment and post-petition due for November 1, 2021.

This 5th day of November, 2021.

/s/ Mark A. Baker
Mark A. Baker
NC Bar No. 32382
McMichael Taylor Gray, LLC
3550 Engineering Drive
Suite 260
Peachtree Corners, GA 30092
404-474-7149
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CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury that he/she is over eighteen (18) years of age and that the **RESPONSE TO TRUSTEE'S MOTION TO DEEM MORTGAGE CURRENT** in the above captioned case were this day served upon the below named persons by mailing, postage prepaid, first class mail a copy of such instrument to each person(s), parties, and/or counsel at the addresses shown below:

Via U.S. Mail

Timothy Drue Thieme
8139 Bud Henderson Rd.
Huntersville, NC 28078

Via CM/ECF electronic service:

Beth Carter
The Law Office of Beth B Carter,
PLLC
P.O. Box 1553
Denver, NC 28037

Jenny P. Holman
Office of the Chapter 13 Trustee
5970 Fairview Rd
Suite 650
Charlotte, NC 28210

This 5th day of November, 2021.

/s/ Mark A. Baker
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McMichael Taylor Gray, LLC
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